

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

MCALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Kaleb J Tijerina	PRINCIPAL	United States
A213 307 197	YOB: 2000	
Graciela Medrano-Sandoval	CO-PRINCIPAL	Mexico
A203 068 901	YOB: 1967	
Ever Arguello	CO-PRINCIPAL	United States
A213 307 196	YOB: 1970	
Thalia Alaniz	CO-PRINCIPAL	United States
A213 307 198	YOB: 1950	

Case Number:

M-20-1797 -M

United States District Court
Southern District of Texas
FILED

SEP 11 2020

David J. Bradley, Clerk

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 9, 2020 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

Ct. 1 knowing or in reckless disregard of the fact that Jose Guadalupe Onate-Avalos, a citizen of Mexico, and Antony Jose Lopez-Portillo, a citizen of Honduras, along with two (2) other undocumented aliens for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas to the point of arrest near Morales Sanchez, Texas,
Ct. 2 knowing or in reckless disregard of the fact that Jose Guadalupe Onate-Avalos, a citizen of Mexico, Antony Jose Lopez-Portillo, a citizen of Honduras, and Manuel Molina-Granado, a citizen of El Salvador, along with five (5) other undocumented aliens for a total of eight (8), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit a residence near Roma, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii), and 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

Border Patrol Agents received information that a residence located at 1704 Rau-Con Street, in Roma, Texas was being used as an alien stash house and that Thalia ALANIZ was the caretaker. On September 9, 2020, Border Patrol Agents conducted surveillance at the residence and observed a black SUV and black truck arrive. Shortly thereafter, the two vehicles departed the residence on Rau-Con St and traveled in tandem to an apartment at 406 Madrigal Street in Roma, Texas.

SEE ATTACHED

Complaint authorized by AUSA A. Greenbaum

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ William A. Dubois Jr.

Signature of Complainant

William A. Dubois Jr. Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

September, 11, 2020
Date

- J: 3 sp. m.

Juan F. Alaniz, U. S. Magistrate Judge
Name and Title of Judicial Officer

at McAllen, Texas
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-20- 1797 -M

**RE: Kaleb J Tijerina
Graciela Medrano-Sandoval
Ever Arguello
Thalia Alaniz**

CONTINUATION:

A male subject, later identified as Ever ARGUELLO, exited the black SUV and gave hand signals to the driver of the black truck indicating for the black truck to travel toward the rear of the apartment. The black truck traveled towards the rear of the apartment and returned shortly thereafter. Both vehicles left the residence on Madrigal Street in tandem and traveled west on US Highway 83. A Texas DPS Trooper conducted a traffic stop on the black truck and identified Kaleb TIJERINA as the driver of the black truck. Agents observed four subjects in the truck which were determined to be illegally present in the United States, including Material witnesses Onate and Lopez.

Other agents approached the black SUV that was still stationary at the intersection. Agents identified Graciela MEDRANO-Sandoval as the driver of the vehicle and ARGUELLO as the passenger. Without being asked, MEDRANO stated, it was all her son's fault. As ARGUELLO exited the vehicle, he slammed his cell phone to the ground, breaking the phone. Under Miranda Rights advisement and waiver, MEDRANO stated she picked up illegal aliens from multiple locations including 1704 Rau-Con Street, and 406 Madrigal Street.

Agents and Roma police officers arrived to 1704 Rau-Con Street, an apartment building with an upstairs unit and a downstairs unit. As agents approached the upstairs unit, they noticed that the front door was more than half way open. Agents observed that the apartment had no furniture and foil covered windows. Agents observed empty water bottles and trash throughout the apartment. Agents encountered three subjects in the unit, including material witness Molina, that were determined to be illegally present in the United States. Agents encountered Thalia ALANIZ at the downstairs unit.

Kaleb J. Tijerina, a U.S. citizen, was read his Miranda Rights. He stated he understood his rights and agreed to provide a statement without the presence of an attorney.

TIJERINA stated he picked up several subjects and knew that one or two of them were illegal aliens. He stated that a "far" cousin asked him to pick up the subjects. He stated that he met a person at Pizza Hut in Roma, Texas where he picked up two subjects, and then followed that person to another location where he picked up two additional subjects. TIJERINA stated he was going to take the subjects to Laredo, Texas.

TIJERINA was shown a photo lineup and identified ARGUELLO as his "far" cousin that asked him for the favor of picking up people.

Graciela MEDRANO-Sandoval, a Lawfully Admitted Permanent Resident, was read her Miranda Rights. She stated she understood her rights and agreed to provide a statement without the presence of an attorney.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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Ever Arguello
Thalia Alaniz**

CONTINUATION:

PRINCIPAL STATEMENTS:

MEDRANO stated that her son asked her to take him to pick up people. She stated she had money trouble. She stated that individuals contacted her son and asked him to pick up people. She stated her son was to receive \$450 per person that was transported. She stated the Arguello was to pay the driver of the black truck. She stated that aliens were picked up from multiple locations MEDRANO identified ARGUELLO in a photo lineup as her son. She identified TIJERINA as the driver of the black truck.

Ever Eli Arguello, a U.S. citizen, was read his Miranda warnings. He stated he understood his rights and agreed to provide a statement without the presence of an attorney.

ARGUELLO stated he did not know why he was being arrested for alien smuggling and stated that he broke his phone in fear that agents would discover information about his drug sales.

Thalia Alaniz, a U.S. citizen, was read her Miranda Rights. She stated she understood her rights and agreed to provide a statement without the presence of an attorney.

ALANIZ stated she was to be paid \$160 to provide food to the aliens in the apartment unit above her. She stated that prior to her encounter with Border Patrol, a black SUV and truck arrived to her apartment to pick up a subject. The subject boarded the black truck and departed the residence.

Material Witness Statements:

Jose Guadalupe ONATE-Avalos, a citizen of Mexico, was advised of his Miranda rights, stated he understood his rights, and agreed to provide a sworn statement.

ONATE claimed his cousin made his smuggling arrangements which totaled \$9,000. ONATE claimed his cousin paid \$2,500. ONATE claimed he crossed the river with 4 others and was picked up by a white Tahoe and taken to an apartment for a couple of days. ONATE claimed that today, 09/09/2020, a black Ram truck arrived, and he was told by the driver to get in the front seat because the back seat had two other people. ONATE claimed that the truck traveled to a second apartment where they picked up one more subject. ONATE claimed they met up with another male subject in a black vehicle and began following it. ONATE claimed they were pulled over by law enforcement shortly thereafter.

ONATE identified TIJERINA, through a photo lineup, as the driver who picked him up at the house and transported him to another house in the Ram truck.

ONATE identified ARGUELLO, through a photo lineup, as the male giving TIJERINA hand signals from the second vehicle.

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Thalia Alaniz**

CONTINUATION:

ONATE identified ALANIZ as the female who brought him food while he was at the upstairs apartment.

Anthony Jose LOPEZ-Portillo, a citizen of Honduras, was advised of his Miranda Rights, stated he understood his Rights, and agreed to provide a sworn statement.

LOPEZ claimed his uncle made his smuggling arrangements and was going to pay \$12,000. LOPEZ claims he crossed the river yesterday (09/08/2020) and was taken to an apartment. LOPEZ claimed the apartment was abandoned with no food, water, or electricity. LOPEZ claims that the following day, a heavy set male subject arrive to the apartment and instructed them to get ready. LOPEZ claims that a black truck arrived and he got in the back seat.

LOPEZ identified TIJERINA, through a photo lineup, as the male driver that picked him up from the house in a black truck.

LOPEZ identified ARGUELLO, through a photo lineup, as the heavy set male subject who spoke with the driver of the black truck and gave him hand signals.

LOPEZ identified Thalia Alaniz as the female who gave him a hamburger at the apartment the night before.

Manuel De Jesus MOLINA-Granado, a citizen of El Salvador, was advised of his Miranda Rights, stated he understood his Rights, and agreed to provide a sworn statement.

MOLINA claims he left El Salvador on August 18, 2020. MOLINA claims his cousin made his smuggling arrangements and claimed his total smuggling fee was \$13,000. MOLINA stated he crossed the river on a raft.

MOLINA was transported to the apartment where they were found by law enforcement. MOLINA claims a female he referred to as "La Guerita" arrived to the apartment to provide food to the group. MOLINA claims that "La Guerita" lived in the apartment unit downstairs and she was the caretaker of the apartment where MOLINA was kept. MOLINA claims they did not have any food or water at the apartment and the restroom was not operational.

MOLINA identified ALANIZ, through a photo lineup, as the caretaker of the apartment where he was being harbored and the person who brought them food.